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November 4, 2020

VIA ECF AND EMAIL

The Honorable John P. Cronan
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007

**Re: *Soto v. The Village in Times Square LLC et al.* (1:20-cv- 05463-JPC)
Request for Adjournment of Initial Pre-Trial Conference**

Dear Judge Cronan:

We represent defendants The Village in Times Square LLC, Giovanni Carollo, and Artemio Cielo (collectively, “Defendants”) in the above-referenced matter. On behalf of Defendants, and with the consent of plaintiff Jose Manuel Xitumul Soto (“Plaintiff”), we respectfully request an adjournment of the Initial Pretrial Conference (the “Conference”) scheduled for November 12, 2020, and of the related November 5, 2020 deadline for the parties to submit a joint pre-Conference letter and proposed case management plan and scheduling order.

Defendants accepted a waiver of service of the complaint filed in this action yesterday, November 3, 2020. As such, Defendants were unable to submit this request more than 48 hours before the parties’ joint pre-Conference letter and proposed case management plan and scheduling is due to the Court. Defendants’ time to respond to the Complaint is currently January 4, 2021. We respectfully request that the Conference be adjourned to a date and time of the Court’s convenience during the week of January 11, 2021, and that the deadline for the parties to submit a pre-Conference letter and proposed case management plan and scheduling order be adjourned to one week prior to the Conference, so that we may have sufficient time to investigate Plaintiff’s claims and prepare our clients’ defenses prior to the Conference.

This application is Defendants’ first request for an adjournment of the Conference and the related deadline for submission of a joint pre-Conference letter and proposed case management plan and scheduling order. No other dates will be affected by this request. Plaintiff consents to this request for an adjournment.

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We thank the Court for its consideration of our request.

Respectfully submitted,
/s/ Alexander Bogdan
Alexander Bogdan

cc: All Counsel of Record. (*via* ECF)

Defendants' request is GRANTED. The pretrial conference scheduled for November 12, 2020 at 11:30 a.m. is adjourned to January 12, 2021 at 12:00 p.m. At the scheduled time, counsel for all parties should call (866) 434-5269, access code 9176261. It is further ORDERED that the parties shall submit the joint letter described in the Court's Notice of Reassignment dated October 13, 2020 (Dkt. 11) by January 5, 2021.

SO ORDERED.

Date: November 4, 2020

New York, New York

JOHN P. CRONAN
United States District Judge